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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RICHARD MCBRIDE, JOHN BEVERLY,
VICTOR LAMSON, DONALD TAYLOR,
RYAN FENNAL, MICHAEL VENEZIALE,
THOMAS MONZO, MANUEL
MARTINEZ, DANIEL MITCHELL,
KEVIN CUNNINGHAM, JUAN LOPEZ,
WAYNE GROVE, WILLIAM NEWNAM,
JR., and RYAN SHORT,

Plaintiffs

v.

KLINE CONSTRUCTION CO., INC.,
KLINE CONSTRUCTION CO., INC.
401(K) PLAN, KATHERINE KLINE-
PENATE, J. EDWARD KLINE, and
ROBERT MILLER,

Defendants.

Civil Action No.: 1:19-cv-14275-NLH-JS

JURY TRIAL DEMANDED

**CERTIFICATION JAMES A. PETKUN
IN SUPPORT OF MOTION FOR *PRO
HAC VICE* ADMISSION**

Pursuant to 28 U.S.C. § 1746, I, James A. Petkun certify and affirm the following:

1. I am counsel for Defendant J. Edward Kline and Katherine M. Kline-Penate (“Defendants”).
2. I am an attorney and Member at the law firm of Klehr Harrison Harvey Branzburg, LLP, with an office located at 1835 Market Street, Philadelphia, PA 19103, with

contact information as follows: Phone: (215) 569-3022, Email: jpetkun@klehr.com, Fax: (215) 568-6603.

3. I respectfully submit that there is good cause for my admission *pro hac vice*. I am fully familiar with the facts and circumstances of this case. The Defendants have requested that I represent them in this matter because of my substantial familiarity with the documents and facts underlying this action.

4. I was admitted to practice law in the Pennsylvania Supreme Court on October 18, 2007. A certificate of my good standing with the Pennsylvania Supreme Court is attached hereto as Exhibit A.

5. I am not currently under any supervision, suspension or disbarment of any Court. There are no active proceedings pending against me in any jurisdiction.

6. I am associated with Carol Ann Slocum, a Partner at Klehr Harrison Harvey Branzburg LLP. Ms. Slocum is an active attorney in New Jersey and is in good standing and not the subject of any suspensions, supervisions or disbarments

7. Concurrently with my application to appear and participate in this matter *pro hac vice*, payment on my behalf is being sent to the New Jersey Lawyers' Fund for Client Protection and Ethics Financial Committee in satisfaction of the fees required by R. 1:28-2 and 1:20-1(b), as same will be paid for any year in which I continue to appear in this matter. I also agree a payment of \$150.00 will be made on my behalf to the Clerk of the District Court for the District of New Jersey in connection with my admission.

8. If this application to appear *pro hac vice* is granted, I agree to:

- a. Abide by the Local Rules of United States District Court for the District of New Jersey and all disciplinary and ethical rules;
- b. Act at all times in a manner consistent with the high standards imposed on

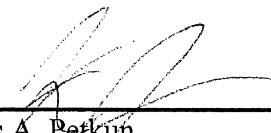
attorneys practicing in the State of New Jersey and before the United States District Court;

- c. Notify the New Jersey Lawyers Fund for Client Protection immediately of any matter affecting my standing at the bar of any court; and
- d. Ensure that all pleadings, briefs and other papers filed with the court signed by an attorney of record authorized to practice in this State in accordance with L. Civ. R. 101.1.

WHEREFORE, it is respectfully requested that this Court enter an Order permitting me to appear *pro hac vice* in this above-entitled litigation on behalf of Defendants J. Edward Kline and Katherine M. Kline-Penate.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: October 28, 2019



James A. Petkun
PA Bar I.D. 206664
Klehr Harrison Harvey Branzburg, LLP
1835 Market Street
Philadelphia, PA 19103

E X H I B I T A



Supreme Court of Pennsylvania

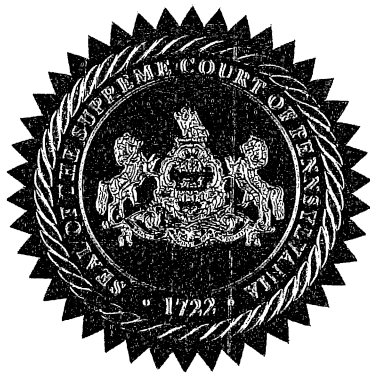
CERTIFICATE OF GOOD STANDING

James Allen Petkun, Esq.

DATE OF ADMISSION

October 18, 2007

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: October 21, 2019

A handwritten signature in black ink, reading "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk